

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEBORAH MEREDITH,)	
)	
Plaintiff,)	1:16-cv-01102-PAG
)	
v.)	Judge Gaughan
)	
UNITED COLLECTION BUREAU, INC.,)	
)	
Defendant.)	

PLAINTIFF'S FIRST NOTICE OF DEPOSITIONS

Pursuant to Fed.R.Civ.P. 30, plaintiff hereby notices the deposition of defendant United Collection Bureau, Inc. as described herein. The depositions will take place on December 6, 2016, at 10:00am, at Troutman Sanders LLP, 600 Peachtree Street NE, Suite 5200, Atlanta, GA 30308-2216, and continue day-to-day until completed. The depositions will be recorded and transcribed by a person authorized to administer oaths, and may be videotaped. The depositions may be taken remotely; by telephone or video phone. Deponents shall be prepared to competently testify as to all information within defendant's possession, custody and control, and should be persons most knowledgeable to provide such testimony, as to the following topics:

1. FRCP 30(b)(6) topic: Actions taken as to Plaintiff's cell phone number, including how UCB and/or any creditor or third party obtained the phone number, the equipment used to make calls and the data that exists concerning such.
2. FRCP 30(b)(6) topic: Defendant's policies, practices and procedures having to do with ensuring that it had data or documents showing that it had consent at the time it made a call to a particular telephone number, including calls made by Defendant or through vendors, for calls that were made or attempted at any time between May 9, 2012, and the present.

3. FRCP 30(b)(6) topic: The existence, quality, scope and location of any databases, data, tables, columns or codes that relate to whether an outbound telephone call was made by you or on behalf of you.

4. FRCP 30(b)(6) topic: The existence (or non-existence), quality, scope and location of any databases, data, tables, columns or codes that relate to the facts and circumstances under which UCB or its creditors or predecessors received phone numbers that were called between May 9, 2012, and the present, including but not limited to:

- a. Loan applications or other transaction-initiating or intake documents;
- b. Prior servicer/collector data;
- c. Creditor data or documents;
- d. Conversations on the telephone;
- e. Skip trace or credit bureau;
- f. ANI call capture;
- g. White pages, internet or similar;
- h. Any other source.

5. FRCP 30(b)(6) topic: The existence, quality, scope and location of any databases, data, tables, columns or codes that relate to consent, or any absence or revocation of consent.

6. FRCP 30(b)(6) topic: The existence, quality, scope and location of any databases, data, tables, columns or codes, policies, practices or procedures that relate to determining whether a particular phone number was a cellular number or not at the time of a call.

7. FRCP 30(b)(6) topic: The data, databases, tables, columns and codes that were used to determine what phone numbers to call, and what phone numbers not to call, with regard

to consent, and how the process of scrubbing phone numbers for consent or cell phone, and then calling numbers.

8. FRCP 30(b)(6) topic: The existence, quality, scope and location of any databases, data, tables, columns or codes that relate to whether a phone number was associated with a debtor, or non-debtor.

9. FRCP 30(b)(6) topic: Identification of any vendor or third party that may have possession, custody or control of any data that relates to telephone calls, the circumstances surrounding how telephone numbers were obtained, whether there had ever been a request to cease and desist or not to call and whether a phone number was a “wrong number.”

10. FRCP 30(b)(6) topic: The existence, quality, scope and location of any databases, data, tables, columns or codes that relate to requests not to call, including cease and desist requests.

11. FRCP 30(b)(6) topic: UCB’s document and data retention policies, practices and procedures having to do with any data associated with any account (such as those on which Meredith’s cell phone was called), and to the extent any putative class member data has been lost, what happened to such.

12. FRCP 30(b)(6) topic: The meaning, nature and content of any documents that have been produced at the time of the deposition, such as “account notes,” call records and data keys and what other documents and data relate to the accounts on which calls were made that have not yet been produced (including but not limited to outcome or result codes, skip trace tables, audit tables, change tables).

Respectfully submitted,
DEBORAH MEREDITH

By: s/ Alexander H. Burke
Attorney for Plaintiff

Dated: November 23, 2016

Alexander H. Burke
BURKE LAW OFFICES, LLC
155 N. Michigan Ave., Suite 9020
Chicago, IL 60601
(312) 729-5288
ABurke@BurkeLawLLC.com
www.BurkeLawLLC.com

David M. Marco (Atty. No.: 6273315)
SMITHMARCO, P.C.
20 South Clark Street, Suite 2120
Chicago, IL 60603
Telephone: (312) 546-6539
Facsimile: (888) 418-1277
E-Mail: dmarco@smithmarco.com
Admitted Pro Hac Vice

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEBORAH MEREDITH,)	
)	1:16-cv-01102-PAG
Plaintiff,)	
)	Judge Gaughan
v.)	
)	
UNITED COLLECTION BUREAU, INC.,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

To: Dustin B. Rawlin
Stephanie A. Rzepka
Tucker Ellis LLP
950 Main Avenue, Suite 1100
Cleveland, OH 44113

Ethan G. Ostroff
Troutman Sanders LLP
222 Central Park Avenue Suite 2000
Virginia Beach, VA 23462
ethan.ostroff@troutmansanders.com

dustin.rawlin@tuckerellis.com
stephanie.rzepka@tuckerellis.com

Lindsey B. Mann
Troutman Sanders LLP
600 Peachtree Street NE Suite 5200
Atlanta, GA 30308-2216
lindsey.mann@troutmansanders.com

I, David M. Marco, an attorney, certify that on **November 23, 2016**, I shall caused to be served a copy of **Plaintiff's Disclosures Pursuant to F. R. Civ. P. 26(a)(1)**, upon the above named individual(s) by: depositing same in the U.S. Mail box at 20 South Clark Street, Suite 2120, Chicago, IL 60603, prior to 5:00 p.m., postage prepaid; messenger delivery; Federal Express; facsimile transmitted from (888) 418-1277; and/or via email, as indicated below.

____ U.S. Mail
____ Messenger Delivery

____ Facsimile
 x Email

By: s/ Alexander H. Burke
Attorney for Plaintiff

Dated: November 23, 2016

BURKE LAW OFFICES, LLC
155 N. Michigan Ave., Suite 9020
Chicago, IL 60601
(312) 729-5288
ABurke@BurkeLawLLC.com
www.BurkeLawLLC.com

David M. Marco (Atty. No.: 6273315)
SMITHMARCO, P.C.
20 South Clark Street, Suite 2120
Chicago, IL 60603
Telephone: (312) 546-6539
Facsimile: (888) 418-1277
E-Mail: dmarco@smithmarco.com
Admitted Pro Hac Vice